AR 201-12718

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cc:

Subject: Comments on CAS#2082-79-3 HPV Submission

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1)In general,too many calculated values with 2f reliability code.Suggests low credibility,and indicates more actual testing should be done,esp on "easy parameters" as MP.
2)BP (#2) is missing entirely with no explanation.
3)Are we to assume "logP" is logPow=13.4?State in results that this is suggestive of Bioaccumulation.
4)Photodegration virtually impossible (VP~10E-13) without artificial conditions.Elaborate on this in Results.
6)Qualify that t1/2 for H20 stability has severe limitations under normal conditions since chemical is virtually insoluble in H20 (~10E-08mg/L).If artificial conditions used,state what they are and run Controls.
7)Fug.Calc.--How can H20 conc. be 2.32% & air be 0.080% given H20 sol (~10E-08mg/L) & VP~10E-13mmHg?
8)Biodeg A--In view of these results & logPow=13.4,state that this chemical is Persistent & Bioacumulative.
Biodeg B--Three deviations from OECD Guidelines:
1. 1.5L vs. 3.0L
2.Treatment of CO2 offgas
3.Use of an emulsifier
Make reliability code of 1 too high.
Need to run a control to account for any biodeg. of emulsifier
9)Acute Aquatic Tox-Fish & Plants-how get ~10E+02mg/L when sol~10E-08?If used artificial conditions (emulsifier,etc.),then need controls.
10) Why is Part.Coeff.for CAS#6683-19-8 in here?
11)Acute Dermal Tox--why is there no Control Group?
12)Acute Inhal Tox--if no adverse tox or mortality observed,why say LC50>1811mg/m3 instead of NOEC>1811?
13)Acute Oral Tox--need Control Group
14)Mutation Assay B--in Results address significance of Control Group
15)Mutation Assay C--"Spontaneous" effect--state & reference frequency observed in historical control groups. May affect credibility of absolute statement "nonmutagenic"
16)Repeat Dose Tox--LOAEL=100mg/kg bw/day & that adverse effects pertain to Liver
17)Repro Tox--state NOAEL=5000ppm based on description of results.How conclude 5000ppm FO & F1 not treatment related?
18)Develop Tox A--how NOAEL of 150mg/kgbw when dose related decrease in food cons noted?Need specifics on Preg & Litter data taken.
"Foetal data @ higher doses do not support conclusions.
B--need more info on Preg/Litter data taken.

Respectfully submitted,
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